

COMMONWEALTH OF MASSACHUSETTS  
UNITED STATES DISTRICT COURT

CIVIL ACTION NO.: 04-11800DPW

ADAM HELFAND, CARON HELFAND, )  
AND MITCHELL HELFAND, )  
Plaintiffs )  
v. )  
THE JOHN DEWEY ACADEMY, INC., )  
THOMAS BRATTER, CAROLE BRATTER, )  
KEN STEINER, AND GWENDOLYN )  
HAMPTON, )  
Defendants )

**JOINT MOTION TO EXTEND THE TIME FOR FILING**  
**STIPULATION OF DISMISSAL**

NOW COME the parties in the above-captioned matter and hereby request this Honorable Court extend the time to file a Stipulation of Dismissal an additional thirty days to **January 8, 2007**. As grounds therefore, the parties state the following:

1. The parties were able to amicably resolve this case on or about September 7, 2006.
2. Since that time, the necessary parties have executed the Settlement Agreement and Release of All Claims ("Agreement").
3. Additional time is needed to accomplish other terms of the Agreement. Plaintiff's counsel has been informed by defense counsel that such terms will be accomplished within the next thirty days, if not sooner.
4. The parties intend to file a Stipulation of Dismissal after the settlement process has been completed.

WHEREFORE, the parties request an additional thirty days to **January 8, 2007** in which to file a Stipulation of Dismissal to allow the parties ample time to secure a fully executed Settlement Agreement and Release of All Claims.

Respectfully submitted,  
The Plaintiffs,  
Adam Helfand, Caron Helfand, and  
Mitchell Helfand,  
By their attorneys,

Respectfully submitted,  
The Defendants,  
The John Dewey Academy, Inc.,  
Thomas Bratter, Carole Bratter,  
and Ken Steiner,  
By their attorneys,

/s/ Djuna E. Perkins  
Laurence E. Hardoon, BBO# 221360  
Djuna E. Perkins, BBO# 561909  
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/s/ William A. Worth  
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William A. Worth, BBO# 554086  
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Respectfully submitted,  
The Defendant,  
Gwendolyn Hampton,  
By her attorney,

/s/ William A. Rota  
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DATED: December 8, 2006